CHECKLIST FOR HAZARDOUS WASTE REDUCTION OPTIONS FOR THE MOTOR VEHICLE MAINTENANCE INDUSTRY

PARTS WASHING

I.	BACKGROUND
A.	Are you using a hazardous solvent in your parts washer(s)? (i.e.: petroleum distillates, mineral spirits, naphtha, aromatic hydrocarbons)
٠	☐ YES ☐ NO - skip to next section
	Is the flash point less than 140° F (see the MSDS)? YES NO (If flash point is less than 140° F, the solvent is a hazardous waste.)
	How many parts washers do you have?
	How often are parts washers changed out?
	Do you contract the service? □ YES □ NO
B.	Collect manifests, invoices or any other generation and cost records.
4.	How much parts cleaner (solvent) waste is generated per year?
-	gallons
	Are change outs required for unforeseen spills or contamination? YES NO
	How much does your parts cleaner solvent cost?
	per gallon/per year
	How much does your parts washer disposal cost? Include transportation, labor, lab tests and other related expenses.
	(per gallon or tank/per year)
C.	Can you base your rate of waste generation on how many parts you clean, how many work

11.	ELIMINATION/SUBSTITUTION:						
	Have you tried a non-hazardous cleaner:						
•	Solvent with flash point greater than 140° F? ☐ YES ☐ NO						
	Aqueous cleaner?						
1)	Look for non-hazardous alternatives. Solvent 140 is a petroleum distillate that is considered non-hazardous (non-ignitable) because it has been formulated so that the flash point is higher than 140° F.						
	Have you checked with suppliers to determine availability? Have you tried such a product? Does it clean suitably? Are you adding anything to the solvent that would lower the flash point?						
List	any barriers or impediments (technical or economical):						
What	t are the positive and negative effects on environment, health and safety and other reduction ts?						
2)	Hot soap cleaners or other aqueous cleaners are very effective parts wash materials. A hot soap washer may replace parts washers and eliminate all hazardous wastes associated with parts cleaning. Oil skimmers can recover the oil before water is discharged to the POTW. However, wastewater authorities should be consulted to determine if any local limits restrict hot soap wastewater discharges.						
	Will aqueous cleaners effectively clean all necessary parts? Due to the cost, could you feasibly replace all parts washers with fewer aqueous cleaners?						
	Can you discharge the wastewater to the sewer?						
List a	any barriers or impediments (technical or economical):						
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What are the positive and negative effects on environment, health and safety and other reduction efforts?

ш.	SOURCE REDUCTION:	.•	:		
1)	Are washers located near exhaust fans or door drafts?		YES		NO
~	Do not locate parts washer stations near exhaust fans and doc closed when not in use. This will reduce evaporation.	or_di	rafts.	Kee	p covers
2)	Is solvent "no longer effective" when it is changed out?		YES	,	NO
	Do not have more parts washer stations than necessary nor scheups".	zdule	unnec	essa	ry "pick
3)	Are parts washers "off" when not in use?		YES		NO
	Pumps that are continuously running volatilizes the product into twashers are "off" when not in use.	he a	ir. Ma	ke s	ure parts
4)	Are washers kept covered when not in use?		YES		NO
•	Keep washers covered when not in use to reduce evaporation.				
5)	How/where do parts drip/dry when removed from washer?		YES		NO
	Let parts drip dry over a drainboard that drains back into the wasolvent loss and improve housekeeping.	ashe	r. Thi	s wi	ll reduce
6)	Are you mixing any non-hazardous chemicals with this waste?		YES		NO
• •	Do not add any non-hazardous substance to the solvent that will waste generated. Keep hazardous and non-hazardous wastes se			he v	olume of
7)	Are employees trained in proper handling?		YES		NO
List a	any barriers or impediments (technical or economical):				÷
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What are the positive and negative effects on environment, health and safety and other reduction efforts?

17.	RECYCLING:
1)	Could you reuse solvent considered "spent" in one operation in an operation where solvent does not have to be as clean?
	Some cleaning operations require a much higher level of cleanliness. Can solvent that is considered too dirty to be used in one operation be transferred and reused in another operation?
2)	Do you recycle the solvent on-site (distill)?
	Install an on-site distillation unit (or other recycling system).
•	Do you use more than one type of solvent? Do you have enough volume for a distillation unit to be feasible? Will distilled solvent meet your cleaning needs?
3)	Is the solvent being sent for recycling or fuels blending off-site? ☐ YES ☐ NO
List a	any barriers or impediments (technical or economical):
· .	
What	are the positive and negative effects on environment, health and safety and other reduction ts?

PAINTING

I. BACKGROUND

A .	What type of paint are you currently using? Circle. solvent-based
	water-based
	contains lead
	•
	contains heavy metals
	Are you mixing any of the above together?
-	Are you thinning the paint? If so, thinner name?
•	Do you have a spray booth? How many?
	Is it enclosed? □ YES □ NO
	What type? Circle. dry filter
	> water-curtain
	powder coat
	If using dry filter, what type? Circle.
	fiber glass
	paper
	styrofoam
	metal
	other
	How often do you change filters?
	Are you mixing waste paint with waste thinner? YES NO
	How do you dispose of this waste? Circle.
	On-site recycling
	Off-site recycling
	Fuels blending
	Other
	Do you have a collection/recycle/repurchase contract?
	If so, with who?
	How often?

B.	Collect manifests, invoices or any other generation and cost records.
	How much paint/thinner waste is generated per year? (separate if applicable)
	gallons
	Are change outs required for unforeseen spills or contamination? YES NO
	What is the cost of your paint and thinner?
	(paint) per gallon/per year
	(thinner) per gallon/per year
	What is your waste disposal cost? Include transportation, labor, lab tests and other related expenses.
	per gallon/per year
C.	Can you base your rate of waste generation on how many parts you clean, how many work orders you complete or any other accounting method?
п.	ELIMINATION/SUBSTITUTION:
•,	Have you tried a non-hazardous paint (some water-based paints, some powder paints)?
	☐ YES ☐ NO
. •	If using paints with heavy metals, have you tried a paint without heavy metals?
	☐ YES ☐ NO
1\	Have you tried a high-solids paint? □ YES □ NO
1)	Investigate the possibility of replacing solvent-based paints with water-based paints to eliminate the use of solvents and thinners as cleaners.
	Use paint without metal pigments.
,	Use high solids low volatile organic compound paints.
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What	are the positive and negative effects on environment, health and safety and other reduction
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ш.	SOURCE REDUCTION:
1)	Do you mix only enough paint to complete a job?
2)	enable operators to use the best size. This would mean a source reduction in two ways. It would limit overmixing and decrease the amount of clean-up solvent needed. However, weighing accuracy becomes more critical. Do you use a gun cleaner that recirculates the solvent? Consider investigating in a gun cleaner that recirculates the wash. Gun cleaners can save as much as 30% on disposal and raw material costs. Rather than filling the spray cup with solvent and spraying the solvent into the booth or air, thinner is sprayed through the gun into the cleaning station where it is condensed for reuse.
3)	Are all paint/thinner container lids kept closed when not in use? YES NO
	Keep all solvent container lids closed to reduce evaporation.
4)	Do you reduce paint viscosity with heaters? ☐ YES ☐ NO
	Paint viscosity is often reduced using thinners. Investigate the use of heaters to reduce viscosity.
5)	Do you control paint inventories to avoid unnecessary disposal? YES NO
	Purchase paints only in quantities needed to avoid discard. Adopt a first-in, first-out inventory practice to reduce wastes associated with expired shelf life.

List any barriers or impediments (technical or economical).

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		\$			•		
6)	Do you tr	ain operator	rs to reduce ov	erspray?		· YES	□ NO
	Train ope	rators to rec	luce overspray	•			
			nent with low o		igh volume lo	w pressure (H	(VLP) guns
	b. sy	Maintain p stems. High	proper pressure ner pressures c	as identified auses paint t	I in operator's o bounce off the	manual for s he car and fo	pecific gun rm a fog.
	c.	Clean spra	y gun nozzles.				
*	d.	Replace da	imaged nozzles	•		•	
	e.	Maintain a	fifty percent o	verlap of sp	ray pattern.	.	
•	f.	Keep spray	gun perpendic	cular to the s	urface.		
	g.	Maintain g	un distance of	six to eight	inches from w	orkpiece.	
	h.	Trigger gu	n at the beginn	ing and end	of each stroke).	• .
	· · · · · · i.	Do not arc	the spray gun	and blow pa	int into the air	•	e.
. (7)	Is solvent	minimized	when cleaning	paint cups?	•	□ YES	□ NO
	Paint cup with solve	s should firsent. New T	st be scraped fi eflon-lined met	ree of paint tal paint cups	using a plastic s provide easie	spatula and er clean-up.	then rinsed
		*					•
List a	any barriers	or impedim	ents (technical	or economic	al).	· · · · · · · · · · · · · · · · · · ·	
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What effort	t are the posits?	tive and neg	ative effects on	environmen	t, health and sa	afety and othe	er reduction

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IV:	RECYCLING:						
1)	Do you reuse solvent until its cleaning capability is exhausted? YES NO						
2)	Could you reuse solvent considered "spent" in one operation in an operation where solvent does not have to be as clean?						
3)	Do you use gun cleaning solvent to thin paint?						
	Thinners should be used until the cleaning capacity has been exhausted. If your disposal is set up on a contract basis, make sure solvent is fully exhausted before it is collected for disposal.						
4)	Do you settle solids out of solvents and reuse the solvent for cleaning or thinning?						
	□ YES □ NO						
,	Gravity separation is inexpensive and relatively easy. The thinner/sludge can be allowed to settle. The clear thinner can be pumped off and used for cleaning. Then only the sludge needs to be disposed.						
5)	Do you distill solvent on-site? □ YES □ NO						
	Recycling of paint thinners and solvents can be done on-site with a distillation unit or off- site through a solvent recycler. Distillation units used to reclaim solvents can also be used to recycle paint thinners. Distillation units have been shown to significantly reduce waste generation and disposal costs.						
	Paint still bottoms have been successfully used to provide undercoatings to protect undercarriages from salt corrosion and rusting.						
6)	Is solvent sent off-site for fuels blending or recycling?						
-							
List ar	ny barriers or impediments (technical or economical).						

IV:

What are the positive and negative effects on environment, health and safety and other reduction efforts?